



United States Environmental Protection Agency
Washington, D.C. 20460
Water Compliance Inspection Report

Section A: National Data System Coding (i.e. PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	FacType
1 <u>N</u> 2 <u> </u>	3 <u>None</u> 11	12 <u>18/09/05</u> 17	18 <u>C</u>	19 <u>S</u>	20 <u>2</u>
Remarks					
21 <u> </u> 66					
Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	-----Reserved-----	
67 <u>15</u> 69	70 <u>1</u>	71 <u>N</u>	72 <u>N</u>	73 <u> </u>	74 <u> </u> 75 <u> </u> 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Tenleytown Trash 6318 Chillum Place NW Washington, DC 20011	Entry Time/Date 12:00 PM 09/05/2018	Permit Effective Date Unpermitted
	Exit Time/Date 1:15 PM 09/05/2018	Permit Expiration Date Unpermitted
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Barney Shapiro – Owner	Other Facility Data (e.g., ISC NAICS, and other descriptive information)	
Name, Address of Responsible Official/Title/Phone and Fax Number Barney Shapiro – Owner – (202) 364-9694 ext. 301 Tenleytown Trash 6318 Chillum Place NW Washington, DC 20011	Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Stormwater	
<input type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
B0N12	Failure to conduct inspections – Quarterly stormwater inspections not conducted
B0N17	Failure to develop and or adequate SWPPP – Facility does not have a SWPPP
B0N18	Failure to implement SWPPP – Spill prevention, cleanup, and housekeeping not conducted at all industrial locations
B0N41	Failure to Maintain Records – Records of inspection and BMP maintenance are not maintained
C0N11	Failure to Monitor – Quarterly visual inspection sampling of discharge not being conducted
BN19B	Failure to properly operate and maintain BMPs – Grit filter on catch basin not maintained

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Robert Burnett	District Department of Energy & Environment Inspection and Enforcement Division – 202.535.1725	9.24.18
Isaac Kelley	District Department of Energy and Environment Inspection and Enforcement Division – 202.535.2691	9.24.18
Joshua Rodriguez	Agency/Office/Phone and Fax Number Inspection and Enforcement Division – 202.535.2226	9.24.18

Comments:



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Isaac Kelley	District Department of Energy and Environment Inspection and Enforcement Division – 202.535.2691	
Joshua Rodriguez	Agency/Office/Phone and Fax Number Inspection and Enforcement Division – 202.535.2226	

Comments:

		PERMIT NO. N/A	
SECTIONS F THRU L: COMPLETE ON ALL INSPECTIONS, AS APPROPRIATE. N/A = NOT APPLICABLE			
SECTION F: FACILITY AND PERMIT BACKGROUND			
ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY (Including City, County and ZIP code) N/A	DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE		
	FINDINGS		
SECTION G: RECORDS AND REPORTS			
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
DETAILS: Facility does not have a MSGP			
(a) ADEQUATE RECORDS MAINTAINED OF:			
(i) SAMPLING DATE, TIME, EXACT LOCATION	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(ii) ANALYSES DATES, TIMES	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(iii) INDIVIDUAL PERFORMING ANALYSIS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(iv) ANALYTICAL METHODS/TECHNIQUES USED	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(v) ANALYTICAL RESULTS (e.g., consistent with self-monitoring report data)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(b) MONITORING RECORDS (e.g., flow, pH, D.O., etc.) MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS (e.g., continuous monitoring instrumentation, calibration and maintenance records)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(d) FACILITY OPERATING RECORDS KEPT INCLUDING LOGS FOR EACH TREATMENT UNIT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(e) QUALITY ASSURANCE RECORDS KEPT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES (and their compliance status) USING PUBLICLY OWNED TREATMENT WORKS	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
SECTION H: PERMIT VERIFICATION			
INSPECTION OBSERVATIONS VERIFY THE PERMIT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
DETAILS: Facility does not have permit			
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(b) FACILITY IS AS DESCRIBED IN PERMIT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT, OR INCREASED DISCHARGES	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(h) CORRECT NAME AND LOCATION OF RECEIVING WATER	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(i) ALL DISCHARGES ARE PERMITTED	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Comments Site does not have a MSGP. Facility has not conducted any inspections or collected any samples for visual analysis or otherwise.			

		PERMIT NO. N/A		
SECTION I: OPERATION AND MAINTENANCE				
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
DETAILS: Only active treatment at the site is a grit filter on one of the catch basins				
(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
(e) ALL TREATMENT UNITS IN SERVICE		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
(g) QUALIFIED OPERATING STAFF PROVIDED		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A
(l) SPCC PLAN AVAILABLE		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
(m) REGULATORY AGENCY NOTIFIED OF BY-PASSING (Dates _____)		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
(n) ANY BY-PASSING SINCE LAST INSPECTION		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
SECTION J: COMPLIANCE SCHEDULES				
PERMITTEE IS MEETING COMPLIANCE SCHEDULE.		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
CHECK APPROPRIATE PHASE(S):				
<input type="checkbox"/> (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION				
<input type="checkbox"/> (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING (mortgage commitments, grants, etc.)				
<input type="checkbox"/> (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED				
<input type="checkbox"/> (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED				
<input type="checkbox"/> (e) CONSTRUCTION HAS COMMENCED				
<input type="checkbox"/> (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE				
<input type="checkbox"/> (g) CONSTRUCTION HAS BEEN COMPLETED				
<input type="checkbox"/> (h) START-UP HAS COMMENCED				
<input type="checkbox"/> (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME				
SECTION K: SELF-MONITORING PROGRAM				
PART 1: FLOW MEASUREMENT				
PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
DETAILS: No self-monitoring program is in place at the facility				
(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
TYPE OF DEVICE:				
<input type="checkbox"/> WEIR	<input type="checkbox"/> PARSHALL FLUME	<input type="checkbox"/> MAGMETER	<input type="checkbox"/> VENTURI METER	<input type="checkbox"/> OTHER (Specify _____)
(b) CALIBRATION FREQUENCY ADEQUATE (Date of last calibration ____)		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(d) SECONDARY INSTRUMENTS (totalizers, recorders, etc.) PROPERLY OPERATED AND MAINTAINED		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

PART 2 - SAMPLING			
PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
DETAILS: Facility does not have a permit and has no required sampling			
(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
IF NO, <input checked="" type="checkbox"/> GRAB <input type="checkbox"/> MANUAL COMPOSITE <input type="checkbox"/> AUTOMATIC COMPOSITE	FREQUENCY		
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(i) SAMPLES REFRIGERATED DURING COMPOSITING	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(ii) PROPER PRESERVATION TECHNIQUES USED	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40CFR136.3	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
PART 3 - LABORATORY			
PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> N/A
DETAILS:			
(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED (40 CFR 136.3)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(e) QUALITY CONTROL PROCEDURES USED	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(f) DUPLICATE SAMPLES ARE ANALYZED _____ % OF TIME	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(g) SPIKED SAMPLES ARE USED _____ % OF TIME	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(h) COMMERCIAL LABORATORY USED	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
(i) COMMERCIAL LABORATORY STATE CERTIFIED	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
LAB NAME:			
LAB ADDRESS:			
TEL.:			
Comments: Grit filter at the site in catch basin not being maintained. No self-monitoring program is in place at the facility and no sampling is being conducted.			

						PERMIT NO. N/A	
SECTION L: EFFLUENT/RECEIVING WATER OBSERVATIONS (Further explanation attached _____)							
OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOLIDS	COLOR	OTHER
Comments:							
(Sections M and N: Complete as appropriate for sampling inspections)							
SECTION M: SAMPLING INSPECTION PROCEDURES AND OBSERVATIONS (Further explanation attached _____)							
<input type="checkbox"/> GRAB SAMPLES OBTAINED <input type="checkbox"/> COMPOSITE OBTAINED <input type="checkbox"/> FLOW PROPORTIONED SAMPLE <input type="checkbox"/> AUTOMATIC SAMPLER USED <input type="checkbox"/> SAMPLE SPLIT WITH PERMITTEE <input type="checkbox"/> CHAIN OF CUSTODY EMPLOYED <input type="checkbox"/> SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE COMPOSITING FREQUENCY _____: PRESERVATION _____: SAMPLE REFRIGERATED DURING COMPOSITING: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A							
SECTION N: ANALYTICAL RESULTS (Attach report if necessary)							

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy & Environment

Natural Resources Administration
Inspection and Enforcement Division



NPDES/MSGP Compliance Inspection Report

Name of Facility: Tenleytown Trash

MSGP Permit No.: Unpermitted Facility

Facility Location: 6318 Chillum Place NW, Washington, DC 20011

Mailing Address: Tenleytown LLC
6318 Chillum Place NW
Washington, DC 20011

Date of Inspection: September 5, 2018

Time of Inspection: 12:00 PM to 1:15 PM

Name of Inspector(s): Isaac Kelley – Environmental Protection Specialist
Robert Burnett – Environmental Protection Specialist

Facility Representatives: Barney Shapiro – Owner

On September 5, 2018, Department of Energy & Environment (DOEE) Inspection and Enforcement Division inspectors Isaac Kelley and Robert Burnett conducted a compliance evaluation inspection (CEI) at the Tenleytown Trash facility located at 6318 Chillum Place NW, Washington, DC. The facility is not covered under the Multi-Sector General Permit (MSGP). However, it was identified as a facility with likely industrial activity located within the District of Columbia municipally separate storm sewer system (MS4) which should potentially be covered under the MSGP. The inspectors reviewed available records, interviewed personnel, and conducted an inspection tour of the facility. Upon completion of the inspection an EPA Form No. 3560-3 Water Compliance Inspection Report was completed. The primary facility representative was Barney Shapiro – Owner. The purpose of the inspection was to determine if the facility required coverage under the MSGP and to assist the facility in coming into compliance with the permit should it be deemed necessary to apply for coverage. The weather at the time of inspection was clear, with a temperature of about 90°F. September 1, 2018 was the date of the last recorded rain event; 0.81 inches of rain was recorded at Reagan National Airport (NCDG) on this date.

Facility Description

The Tenleytown Trash facility is a 1.35-acre maintenance facility located in northwest Washington DC. The facility consists of a vehicle maintenance building surrounded by parking areas used to store garbage trucks when not in service and trash bins and roll-off dumpsters prior to distribution to sites for use. Please refer to **Figure 1** for an aerial photo of the facility.

The Tenleytown Trash facility is a former US Postal Service maintenance facility that was purchased by the Tenleytown Trash in 2012 to be used as a maintenance facility for a fleet of 36 garbage trucks. In the center of the property is a large maintenance building in which a full range of maintenance services are conducted on garbage trucks (Photograph No. 1). Drains within the maintenance building are reportedly on a closed system which connect to a central cistern.

Areas exposed to stormwater at the facility include the parking area where vehicles are stored, the staging areas for trash bins and roll-off dumpsters, and the diesel fuel storage tank and dispenser.

Hazardous and Non-Hazardous Material Storage

The facility does not maintain a record of all hazardous and non-hazardous materials stored on the site, but are in the process of developing one as part of their SWPPP. Solvents, oils, and other fluids were observed stored in storage lockers throughout the interior of the facility. The facility contains a 2,000-gallon diesel above ground storage tank (AST) used to fuel the fleet of vehicles maintained at the site. The AST is double-walled, but does not have a retaining wall around it for additional protection from the adjacent catch basin.

The owner stated that waste oil at the facility is disposed of by an outside contractor on an as-needed basis. Manifests for disposal were not available for review.

The garbage trucks in use at the site dispose of trash at the Fort Totten trash transfer station and do not bring garbage to the site for sorting or transfer.

Facility Drainage

The facility has three catch basins located on the western portion of the site (behind the maintenance building) (Photographs No. 2, 3, and 4). The east parking lot of the building has two curb inlet drains for stormwater from this area and there is one curb inlet in the southeast corner of the parking lot (Photographs No. 5, 6, and 7). The drains discharge to the MS4 southeast of the site at a manhole located in the middle of Chillum Place NW. The owner of the facility stated that there is no oil-water separator or other treatment on the system prior to its discharge to the MS4.

Asphalt throughout the site was heavily stained with oil and an inspection of the catch basins at the facility found the water within to be turbid with an oil sheen on it.

Observations

The interior of the facility was in decent condition and trench drains were present at the entrances to maintenance bays to prevent fluids from the inside of the building did not flow out. Paint and other stains were observed that showed that internal spills have left the building historically (Photograph No. 8 and 9). The internal drains are reportedly connected to a closed system that drains to a central cistern; however, the owner states that he's never had to have the cistern pumped out, so the possibility exists that it is connected to an outside sewer line.

The exterior parking lot of the facility was in poor condition. The lot was heavily stained in all areas, with high sediment loads present as well (Photographs No. 10, 11, 12, and 13). Trucks awaiting maintenance were observed leaking oil and garbage fluid from their beds (Photographs No. 14 and 15). The catch basins at the facility were surrounded by oil absorbent boom to prevent oil from entering them. The booms were new and appeared to have been recently deployed, with the owner of the facility stating that the booms are replaced as needed. Inspection of the catch basins at the facility found oil staining in the catch basins and the water within was observed to be turbid with an oil sheen visible. One of the catch basins was outfitted with a grit trap that is reportedly emptied on a daily basis to prevent sediment from accumulating in the stormwater drainage system.

The trash bin storage areas at the site were in good condition, with no raw metal or unfinished materials observed stored outside. The roll-off dumpsters awaiting deployment to sites were rusted in areas and mild rust staining was observed on the asphalt surface around them as well as mounds of quick dry material that had not been cleaned up from previous releases (Photograph No. 16).

Records and Reports Review

The facility does not currently hold an NPDES permit and does not maintain a SWPPP. The owner stated that the site does not conduct any quarterly or annual site inspections and no stormwater pollution prevention training is undergone by the employees at the site.

Permit Verification

The site does not currently have coverage under an NPDES permit.

Operation and Maintenance

The facility does not have or maintain any BMPs intended to limit the amount of pollutants leaving the site via stormwater, with the exception of a grit trap located in one catch basin behind the facility. The owner stated that the grit trap is emptied on a daily basis, but at the time of inspection it was observed to have sediment in it.

SWPPP Review

The Tenleytown Trash facility does not maintain a SWPPP.

Compliance Schedules

This inspection included a review of any applicable compliance schedules in effect at the facility. The facility is not currently subject to a compliance schedule.

Self-Monitoring Program

The site is not currently covered under a NPDES permit and not subject to a self-monitoring program.

Effluent/Receiving Water Observations

As part of this inspection, effluent waters or receiving waters were not observed to determine conditions. Facility personnel did not know the exact discharge location of their system other than to state it discharged in a manhole southeast of the site in Chillum Place NW.

Sampling Inspection Procedures and Observations

No samples were collected during the course of this inspection.

Inspection Summary



The Tenleytown Trash facility is a garbage truck maintenance facility located in northwest, Washington, DC. The facility is not covered under an MSGP and the purpose of the inspection was to determine if the facility has exposed industrial activity and needs coverage under the MSGP.


The vehicle maintenance activities appeared to be conducted entirely under cover and unlikely to be impacted by stormwater. The parking lot of the facility was in very bad shape with nearly the entire surface of it stained with oil and trash fluid that had leaked from the compactor on the garbage trucks. The facility has no SWPPP and the staff does not undergo any stormwater training. Minor spills and leaks were observed across the property and basic housekeeping practices such as regular sweeping and addressing spills with dry cleanup methods upon discovering them were not being applied. The facility stated that booms are always present around the catch basins behind the site to prevent spilled oil from entering them, but the booms observed appeared to have been recently installed and the catch basins throughout the site were heavily stained and the water within had an oil sheen. The garbage trucks in use at the site were in poor condition with the seals on the compactors not sealing entirely and allowing trash fluid to leak out onto the ground at the site; additionally, several of the trucks were observed with minor oil leaks and small puddles beneath them.



No industrial activity was observed outside of the maintenance building, but due to the volume and nature of the maintenance at the site and the abundance of leaked oil and trash liquid outside of the building the industrial activity being conducted indoors is impacting stormwater at the site. Furthermore, the impacted stormwater at the site is discharged to the MS4 without treatment. It is DOE's determination that the site should be required to develop and

implement a SWPPP, apply for MSGP coverage, and begin stormwater inspections and stormwater monitoring to address the many concerns at the facility.

Inspection or Case File Name:		Case Number or Schedule ID:	
Facility Name: Tenleytown Trash		Facility Address: 6318 Chillum Place NW	
Photograph No. 1			
Photographer: Robert Burnett			
Inspection Date: September 5, 2018			
Direction: Northwest			
Description: The Tenleytown Trash maintenance building located at 6318 Chillum Place NW.			
Photograph No. 2			
Photographer: Robert Burnett			
Inspection Date: September 5, 2018			
Direction: South			
Description: Catch basin behind the Tenleytown Trash maintenance building adjacent to the diesel AST.			



Inspection or Case File Name:		Case Number or Schedule ID:	
Facility Name: Tenleytown Trash		Facility Address: 6318 Chillum Place NW	
Photograph No. 3			
Photographer: Robert Burnett			
Inspection Date: September 5, 2018			
Direction:			
Description: Photograph of the water contained within the catch basin shown in Photograph No. 2 showing the water within to be turbid with oil on top.			
Photograph No. 4			
Photographer: Robert Burnett			
Inspection Date: September 5, 2018			
Direction:			
Description: Grit trap located within second catch basin behind Tenleytown Trash maintenance building full of sand and in need of maintenance.			



Inspection or Case File Name:		Case Number or Schedule ID:	
Facility Name: Tenleytown Trash		Facility Address: 6318 Chillum Place NW	
Photograph No. 5			
Photographer:			
Robert Burnett			
Inspection Date:			
September 5, 2018			
Direction:			
South			
Description:			
Curb inlet near the entrance to the Tenleytown Trash facility with absorbent boom in front of it.			
Photograph No. 6			
Photographer:			
Robert Burnett			
Inspection Date:			
September 5, 2018			
Direction:			
Description:			
Photograph of the water within the curb inlet shown in Photograph No. 5 showing oil and debris in the inlet.			

Inspection or Case File Name:		Case Number or Schedule ID:	
Facility Name: Tenleytown Trash		Facility Address: 6318 Chillum Place NW	
Photograph No. 7			
Photographer:			
Robert Burnett			
Inspection Date:			
September 5, 2018			
Direction:			
South			
Description:			
Curb inlet in the southeast corner of the Tenleytown Trash facility adjacent to the trash dumpsters at the site. Sediment accumulations and oil stains can be seen on the surface near the inlet.			
Photograph No. 8			
Photographer:			
Robert Burnett			
Inspection Date:			
September 5, 2018			
Direction:			
Description:			
Paint staining at one of the maintenance bays of the facility outside of the building and not collected by the internal trench drain.			

Inspection or Case File Name:		Case Number or Schedule ID:	
Facility Name: Tenleytown Trash		Facility Address: 6318 Chillum Place NW	
Photograph No. 9			
Photographer: Robert Burnett			
Inspection Date: September 5, 2018			
Direction: West			
Description: Quick-dry material spread across the entrance to one of the maintenance bays at the facility.			
Photograph No. 10			
Photographer: Robert Burnett			
Inspection Date: September 5, 2018			
Direction: North			
Description: Northwest corner of the property, showing sediment accumulations and the asphalt surface showing spills and stains.			

Inspection or Case File Name:		Case Number or Schedule ID:	
Facility Name: Tenleytown Trash		Facility Address: 6318 Chillum Place NW	
Photograph No. 11			
Photographer:			
Robert Burnett			
Inspection Date:			
September 5, 2018			
Direction:			
Northwest			
Description:			
Additional photo of the northwest corner of the property showing additional oil spills and staining, in addition to uncovered roll-off dumpsters.			
Photograph No. 12			
Photographer:			
Robert Burnett			
Inspection Date:			
September 5, 2018			
Direction:			
West			
Description:			
Quick-dry material spread in the parking lot at the front of the maintenance building that has not been cleaned up.			

Inspection or Case File Name:		Case Number or Schedule ID:	
Facility Name: Tenleytown Trash		Facility Address: 6318 Chillum Place NW	
Photograph No. 13			
Photographer:			
Robert Burnett			
Inspection Date:			
September 5, 2018			
Direction:			
North			
Description:			
Heavy oil staining on the asphalt surface adjacent to the diesel dispenser and the nearby catch basin.			
Photograph No. 14			
Photographer:			
Robert Burnett			
Inspection Date:			
September 5, 2018			
Direction:			
Description:			
Out of service trash truck at the facility leaking oil onto the surface.			

Inspection or Case File Name:		Case Number or Schedule ID:	
Facility Name: Tenleytown Trash		Facility Address: 6318 Chillum Place NW	
Photograph No. 15			
Photographer:			
Robert Burnett			
Inspection Date:			
September 5, 2018			
Direction:			
Description:	An accumulation of trash fluid that has leaked from the compactor of a trash truck.		
Photograph No. 16			
Photographer:			
Robert Burnett			
Inspection Date:			
September 5, 2018			
Direction:	West		
Description:	Rusted trash dumpsters and a mound of quick dry material that was used to address a spill but was not cleaned up following absorption.		

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy & Environment**

NPDES/MSGP Compliance Inspection Report

Tenleytown Trash – 6318 Chillum Place NW, Washington, DC

Facility Inspectors: Isaac Kelley – DOEE
Robert Burnett – DOEE

Inspection Date: September 5, 2018

Facility Representatives: Barney Shapiro - Owner



Figure 1: An aerial photograph of the Tenleytown Trash facility located at 6318 Chillum Place NW, Washington, DC.